

October 11, 2021

Micky Tripathi, Ph.D., M.P.P.  
National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C St SW  
Washington, DC 20416

Dear Mr. Tripathi,

In response to the recent announcement of the delayed timeline for the Standards Version Advancement Process (SVAP), the HIMSS Electronic Health Record Association (EHRA) would like to provide some direct feedback and recommendations to the Office of the National Coordinator for Health IT (ONC) on what we believe are necessary additional steps to avoid any unintended negative consequences of the delay.

The EHRA appreciates the ONC's efforts to ensure the SVAP timelines are appropriately aligned with those for development and publication of new versions of exchange standards necessary for new versions of the U.S. Core Data for Interoperability (USCDI) to be adopted under SVAP. However, we feel strongly that delaying the current round of new versions of adopted standards being considered for SVAP – other than USCDI V2 – is unnecessary. Further, we feel that the delay will unintentionally inhibit the ability of developers and their clients to move forward with supporting those new versions in a timely manner.

Accordingly, we highly recommend that ONC move forward approving those new versions of adopted standards currently under consideration for SVAP (other than USCDI V2) on the originally planned timeline of January 2022. This will allow developers and their clients to advance to these newer versions without being unnecessarily delayed by the unique needs of the USCDI standard.

After adopting these new versions of standards in January 2022, the ONC could then provide a subsequent round of standards to be considered and commented on for the new May 2022 deadline (with June 2022 announcement and August 2022 adoption). Considering adoption of these proposed standards would be purely voluntary, we see no potential downside to expediting their approval, whereas delaying it would create an approximate eight-month setback for the industry.

---

AdvancedMD  
Allscripts  
Athenahealth  
BestNotes  
Bizmatix  
Cerner Corporation

CPSI  
CureMD  
eClinicalWorks  
eMDs  
Endosoft  
Epic

Experity Health  
Flatiron Health  
Foothold Technology  
Greenway Health  
Harris Healthcare Group  
Lumeris

MEDHOST  
MEDITECH, Inc.  
Medsphere  
Modernizing Medicine  
Netsmart  
Nextech

Nextgen Healthcare  
Office Practicum  
Sevocity - Division of  
Conceptual Mindworks, Inc.  
STI Computer Services  
Varian Medical  
Systems

New versions of standards recommended for adoption in January 2022:

- Applicability Statement for Secure Health Transport Version 1.3, May 2021 (Direct)
- CMS Implementation Guide for Quality Reporting Document Architecture: Category I; Hospital Quality Reporting; Implementation Guide for 2022 (July 2021)
- CMS Implementation Guide for Quality Reporting Document Architecture: Category III; Eligible Clinicians and Eligible Professionals Programs; Implementation Guide for 2022 (May 2021)
- HL7 FHIR® US Core Implementation Guide STU 4.0.0 (June 2021)

We believe that this bi-annual SVAP cadence – which would yield January and June SVAP approvals for 2022 – would be appropriate to continue moving forward. This would also accommodate standards that will be relevant at the start of each calendar year, such as the annual CMS QRDA specifications and those that relate to USCDI midsummer, and others that could be considered at either time based on availability. The latter would include more current updates to support a prior USCDI version that is recognized in SVAP or the certification edition. Such a 6-month SVAP cadence would fit progression and opportunities for voluntary adoption.

On behalf of our nearly 30 EHRA member companies, we appreciate this opportunity to provide input on the ONC's efforts to create a health care system that results in better accessibility, quality, affordability, empowerment, and innovation.

Sincerely,



Hans J. Buitendijk  
Chair, EHR Association  
Cerner Corporation



David J. Bucciferro  
Vice Chair, EHR Association  
Foothold Technology

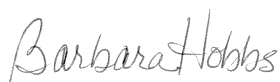
**HIMSS EHR Association Executive Committee**



Pamela Chapman  
Experity Health



William J. Hayes, M.D., M.B.A.  
CPSI

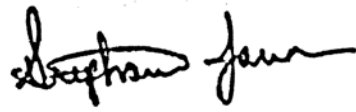


Barbara Hobbs



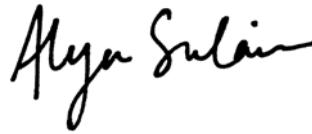
Cherie Holmes-Henry

MEDITECH, Inc.



Stephanie Jamison  
Greenway Health

NextGen Healthcare



Alya Sulaiman, JD  
Epic

***About the HIMSS EHR Association***

***Established in 2004, the Electronic Health Record (EHR) Association is comprised of nearly 30 companies that supply the vast majority of EHRs to physicians' practices and hospitals across the United States. The EHR Association operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care as well as the productivity and sustainability of the healthcare system as a key enabler of healthcare transformation. The EHR Association and its members are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families. The EHR Association is a partner of HIMSS.***

***For more information, visit [www.ehra.org](http://www.ehra.org).***